



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

3 December 2004

Reply To
Attn Of: OCE-084

Mr. Timothy M. Clancy, Supervisor
King County Property Services Division
500 King County Administration Building
500 Fourth Avenue
Seattle, WA 98014

Mr. George G. McCaslin, General Manager & Principal
Prezant Associates, Inc.
330 6th Avenue North, Suite #200
Seattle, WA 98109

Re: Polychlorinated Bi-Phenyl (PCB) Remediation at
Surrydowns Children's Center
609 112th Avenue S.E., Bellevue, Washington.
Self-Implementing Remediation 40 CFR § 761.61(a)

Dear Messrs. Clancy & McCaslin:

We have reviewed your December 2, 2004 PCB Characterization Report , for Polychlorinated Bi-Phenyl (PCB) sampling, cleanup and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs in the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington. Your proposed PCB cleanup plan as described in your December 2, 2004 PCB Characterization Report is acceptable to EPA Region 10. We understand that the both the King County Property Services Division and Prezant Associates, Inc., have agreed to perform the actions listed below and our acceptance of the PCB cleanup proposal is conditional upon your agreement to the following:

1. The King County Property Services Division and Prezant Associates, Inc., will complete the following by January 15, 2005:
 - a. The removal of all PCB waste from the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington.
 - b. The removal of all PCB contaminated carpeting and tile from the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington.
 - c. The disposal/incineration of all PCB remediation waste, from the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue,

Washington with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous nonmunicipal waste landfill subject to the requirements of 40 CFR §§ 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

- d. The disposal/incineration of all PCB remediation waste, from the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington with a PCB concentration of \geq 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
- e. The disposal/incineration of all PCB bulk product waste, including light ballasts containing PCBs in the potting compound, from the Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington in accordance with 40 CFR §§ 761.62(a)(1) - (7).
- f. Complete the decontamination of the light fixtures, a non-porous surface coated with a porous surface, under 40 CFR § 761.79(a)(5) in accordance with 40 CFR § 761.61(b)(3)(i)(B); or in the alternative submit a request for an alternative decontamination approval under 40 CFR § 761.79(h). Alternatively, the light fixtures may be assumed to be contaminated with PCBs at a concentration of \geq 50 ppm and disposed of as PCB contaminated waste in accordance with the requirements of item 1.d.
- g. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.
- h. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.
- i. The identification on all appropriate facility drawings at Surrydowns Children's Center located at 609 112th Avenue S.E., Bellevue, Washington of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the Surrydowns Children's Center. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.
- j. Perform the required PCB verification sampling in accordance with

40 CFR §§ 761.61(a)(6)(i)-(ii).

- k. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv), 40 CFR § 761.292 (Subpart O) for porous materials and 40 CFR §§ 761.300-316 (Subpart P) for non-porous materials.
- 1. Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).
- 2. The King County Property Services Division and Prezant Associates, Inc., will provide to EPA Region 10, the Seattle & King County Public Health, and the Washington Department of Ecology (WDOE) a final report documenting the completion of the above items. This report will be provided no later January 31, 2005. This report will also include:
 - a. The results of PCB sampling and disposal.
 - b. The results of the removal of PCBs to less than 1 ppm PCBs or $10\mu\text{g}/100\text{cm}^2$.
 - c. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained King County Property Services Division and the Surrydowns Children's Center as well as the Washington Department of Ecology.

This determination by EPA does not obviate the King County Property Services Division and Prezant Associates Inc., from the responsibility to comply with requirements of other federal laws and applicable Washington State requirements under Washington Administrative Code (WAC).

If you have any questions, please contact Daniel Duncan, Regional PCB Program Manager, of my staff. He can be reached at EPA Region 10, Office of Waste and Chemicals Management, M/S AWT-128, 1200 Sixth Avenue, Seattle, Washington 98101, telephone (206) 553-6693 or duncan.daniel@epa.gov.

If you have any questions on PCB sampling methods, please contact Mr. Roy Araki,
Quality Assurance Manager, Office of Environmental Assessment, telephone (206) 553-6395.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Debbie Colburn, Surrydowns Childcare Center
Barbara Wright, Deputy Director- Public Health, Seattle & King County
Paul Tanaka, County Administrative Officer, King County
Elaine Kraft, Communications Director, King County
Greg Kuhn, King County Safety & Health
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Richard R. Kauffman, M.S.
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bcc: Michael A. Bussell, OCE
Tom Eaton, WOO